

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

WILLIAM J. GAVIN,

Plaintiff,

v.

BULL HN INFORMATION

SYSTEMS INC.,

Defendant.

Civil Action No. 04-12207-GAO

**MOTION OF DEFENDANT
BULL HN INFORMATION SYSTEMS INC. TO FILE REPLY**

Defendant Bull HN Information Systems Inc. (hereafter “Bull”) respectfully requests the Court’s leave to file a Reply to the Plaintiff’s Opposition to Bull’s Motion for Summary Judgment. As grounds therefor, Bull states that further briefing on issues raised in Plaintiff’s Opposition may assist the Court and clarify the issues presented in Bull’s Motion for Summary Judgment.

REQUEST FOR ORAL ARGUMENT

Bull respectfully requests that the Court hear oral argument on Bull's Motion for Summary Judgment.

Respectfully submitted,

BULL HN INFORMATION SYSTEMS INC.

By: /s/ Mary Jo Harris
Laurence J. Donoghue (BBO No. 130140)
Mary Jo Harris (BBO No. 561484)
Daniel F. McCabe, Jr. (BBO No. 661096)
MORGAN, BROWN & JOY, LLP
200 State Street
Boston, MA 02109
Tel: (617) 523-6666

Dated: July 18, 2006

CERTIFICATE OF SERVICE

I, Mary Jo Harris, hereby certify that the foregoing document was filed through the ECF system on July 18, 2006, and that a true paper copy of this document was sent to those indicated as non registered participants on the Notice of Electronic Filing on July 18, 2006 by first class mail. I further certify that a courtesy copy of the foregoing document was served on July 18, 2006 by first class mail upon plaintiff's counsel: Howard I. Wilgoren, Esq., 6 Beacon Street, Boston, MA, 02109.

Dated: July 18, 2006

_____/s/ Mary Jo Harris_____
Mary Jo Harris